

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

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)  
Cathie Jung, an individual )  
Plaintiff. )  
) CIVIL ACTION NO. 1:09 cv 1353  
v. ) AJT/JFA  
)  
CATHIEJUNG.COM, an Internet Domain Name )  
Defendant. )  
)  
)

**DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF  
PLAINTIFF'S MOTION FOR AN AMENDED ORDER**

I, Stephen H. Sturgeon, Jr., hereby declare as follows:

- 1) I am counsel for the plaintiff in the above-captioned proceeding. I am over 18 years of age, have personal knowledge of the matters set forth in this Declaration, and I am competent to testify to those matters.
- 2) This court previously issued an order in this proceeding transferring the domain name <CATHIEJUNG.COM> to the Plaintiff. (Exhibit A to this Declaration) The proposed order that I had originally submitted to the court is attached to this Declaration as Exhibit C.
- 3) Upon receipt of the order of the court, I sent a copy of the order to Verisign, Inc. (“Verisign”), the registry of the domain name, addressed to Mr. Thomas C. Indelicato, Esquire, Vice President and Associate General Counsel of VeriSign. I requested that the

domain name <CATHIEJUNG.COM> be transferred to the Plaintiff in accordance with the order.

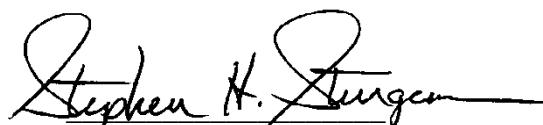
4) After Verisign's research of the issue and after discussions with attorneys in the legal department of Verisign, Mr. James T. Hubler, Esquire, Senior Corporate Counsel, Global Law Department stated Verisign's position on the issue of Verisign's compliance with the order and sent an email to me stating Verisign's position on the issues. (Exhibit B to this Declaration)

5) Mr. Hubler's email advised me of the wording of an order with which Verisign would comply.

6) The wording suggested by Mr. Hubler is consistent with the wording of the Report and Recommendation of the Magistrate Judge in this proceeding (Exhibit D to this Declaration)

7) Pursuant to 28 U.S.C. §1746 I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

July 9, 2010

  
Stephen H. Sturgeon  
Stephen H. Sturgeon, Jr.